

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit E

Page 1

1 IN THE UNITED STATES DISTRICT COURT.
2 FOR THE DISTRICT OF SOUTH CAROLINA
3 COLUMBIA DIVISION

4 -----x
5 THE SOUTH CAROLINA STATE CONFERENCE
6 OF THE NAACP

7 and

8 TAIWAN SCOTT, ON BEHALF OF HIMSELF Case No.
9 AND ALL OTHER SIMILARLY SITUATED 3:21-CV-03302
10 PERSONS, JMC-TJH-RMG

11 Plaintiffs,

12 Vs.

13 THOMAS C. ALEXANDER, IN HIS OFFICIAL
14 CAPACITY AS PRESIDENT OF THE SENATE;
15 LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY
16 AS CHAIRMAN OF THE SENATE JUDICIARY
17 COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL
18 CAPACITY AS SPEAKER OF THE HOUSE OF
19 REPRESENTATIVES; CHRIS MURPHY, IN HIS
20 OFFICIAL CAPACITY AS CHAIRMAN OF THE
21 HOUSE OF REPRESENTATIVES JUDICIARY
22 COMMITTEE; WALLACE H. JORDAN, IN HIS
23 OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE
24 OF REPRESENTATIVES ELECTIONS LAW
25 SUBCOMMITTEE; HOWARD KNAPP, IN HIS
 OFFICIAL CAPACITY AS INTERIM EXECUTIVE
 DIRECTOR OF THE SOUTH CAROLINA STATE
 ELECTION COMMISSION; JOHN WELLS, JOANNE
 DAY, CLIFFORD J. EDLER, LINDA MCCALL,
 AND SCOTT MOSELEY, IN THEIR OFFICIAL
 CAPACITIES AS MEMBERS OF THE SOUTH
 CAROLINA STATE ELECTION COMMISSION,
 Defendants.

-----x

22 STENOGRAPHIC REMOTE VIRTUAL DEPOSITION
23 BREEDEN JOHN
24 Tuesday, August 9, 2022

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1

2 STATE OF NEW YORK)

3 ss.:

4 COUNTY OF NEW YORK)

5

6 I, ERICA L. RUGGIERI, RPR and a
7 Notary Public within and for the State
8 of New York, do hereby certify:9 That I reported the proceedings
10 in the within-entitled matter, and
11 that the within transcript is a true
12 record of such proceedings.13 I further certify that I am not
14 related by blood or marriage, to any
15 of the parties in this matter and
16 that I am in no way interested in the
17 outcome of this matter.18 IN WITNESS WHEREOF, I have
19 hereunto set my hand this 17th day of
20 August, 2022.

21



22

23

ERIC A. RUGGIERI, RPR, CSR, CLR

24

25

1 JOHN

2 | interest were defined?

3 A. Yes. I guess, you know, to
4 the extent that I mean, yes.

5 Coastal life-style is different from
6 life in the upstate, for instance,
7 in terms economies and recreation
8 and interests and all that.

9 Q. What about any history of
10 racial discrimination for people of
11 African decent?

12 A. Not particularly.

13 Q. Can you describe how
14 partisan considerations factored
15 into the development of this plan?

16 A. Primarily didn't want to
17 significantly change the 1st
18 District and the 6th District.
19 Didn't want to make significant
20 changes to their political leanings
21 as they were drawn under the
22 benchmark plan.

23 Q. That was a view shared by
24 the core redistricting team?

25 A. Yeah.

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1

2 INSTRUCTIONS TO WITNESS

3

4 Please read your deposition over
5 carefully and make any necessary
6 corrections. You should state the reason
7 in the appropriate space on the errata
8 sheet for any corrections that are made.

9 After doing so, please sign the
10 errata sheet and date it.

11 You are signing same subject to
12 the changes you have noted on the errata
13 sheet, which will be attached to your
14 deposition.

15 It is imperative that you return
16 the original errata sheet to the deposing
17 attorney within thirty (30) days of
18 receipt of the deposition transcript by
19 you. If you fail to do so, the deposition
20 transcript may be deemed to be accurate
21 and may be used in court.

22

23

24

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1

2 E R R A T A

3

4 I wish to make the following changes, for
5 the following reasons:

6 PAGE LINE

7

CHANGE:

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REASON:

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REASON:

WITNESS' SIGNATURE

DATE